Mr. Timothy Browning GAC Indianapolis, Web Division 5455 West 84th Street Indianapolis, IN 46268

> RE: AAF 097-12371-00145 Second Administrative Permit Amendment to FESOP F097-5516-00145

Dear Mr. Timothy Browning:

GAC Indianapolis, Web Division was issued a permit (FESOP) on December 12, 1996, related to the operation of the Lithographic Heatset Offset Presses. A letter requesting an Administrative Permit Amendment was received on June 9, 2000 Pursuant to the provisions of the 326 IAC 2-8-10(a)(6) the permit is hereby administratively amended as follows:

Section A, Condition A.2 Emission Units and Pollution Control Summary (page 4)

- 1) Emitting units number one (1) is a Heidelberg Lithographic Heatset Offset Web Press model number M-9 equipped with a 0.75 MMBTU/hour natural gas fired dryer. The Heidelberg Press has a maximum operating capacity of 25.58 million square inches per hour. VOC and HAP emissions are controlled by a 3.36 MMBTU/hour Thermal Incinerator exhausting out one (1) stack identified as S₂.
- 2) Emitting units number two (2) is a Heidelberg -Harris Lithographic Heatset Offset Web Press model number M-600 equipped with a 0.75 MMBTU/hour natural gas fired dryer. The Heidelberg Press has a maximum operating capacity of 26.92 million square inches per hour. VOC and HAP emissions are controlled by a 3.36 MMBTU/hour Thermal Incinerator exhausting out one (1) stack identified as S₂.
- 3) Emissions Unit number three (3) Videojet Printer inkjet printer model number Excel 17089416. The Videojet Printer inkjet printer has a maximum ink usage of equal to or less than 0.5527 pounds per hour and a maximum usage of makeup solvent of equal to or less than 0.8357 pounds per hour. Emissions from this unit are vented into the building. This unit was installed in 1997 after June 9, 2000.

Section D.1 Facility Description and Section D.1 Conditions D.1(b) and D.1.2(a) and (b)(page 26)

SECTION D.1 FACILITY OPERATION CONDITIONS

Emitting units number one (1) is a Heidelberg Lithographic Heatset Offset Web Press model number M-9 equipped with a 0.75 MMBTU/hour natural gas fired dryer. The Heidelberg Press has a maximum operating capacity of 25.58 million square inches per hour. VOC and HAP emissions are controlled by a 3.36 MMBTU/hour Thermal Incinerator exhausting out one (1) stack identified as S₂.

Emitting units number one (2) is a Heidelberg Lithographic Heatset Offset Web Press model number M-600 equipped with a 0.75 MMBTU/hour natural gas fired dryer. The Heidelberg Press has a maximum operating capacity of 26.92 million square inches per hour. VOC and HAP emissions are controlled by a 3.36 MMBTU/hour Thermal Incinerator exhausting out one (1) stack identified as S₂.

Emissions Unit number three (3) Videojet Printer inkjet printer model number Excel 17089416. The Videojet Printer inkjet printer has a maximum ink usage of equal to or less than 0.5527 pounds per hour and a maximum usage of makeup solvent of equal to or less than 0.8357 pounds per hour. Emissions from this unit are vented into the building. This unit was installed in 1997 after June 9, 2000.

D. 1.1 Volatile Organic Compound Emissions: [326 IAC 8-1-6][326 IAC 2-8-4(1)]

(b) Pursuant to 326 IAC 2-8-4(1), the total VOC emissions from the model M-9 Heidelberg Press (emission unit #1), model M-600 Heidelberg-Harris Press (emission unit #2) and Videojet Printer inkjet printer (emission unit #3) shall not exceed 7.72 tons per month. This emissions limitation is equivalent to 98.28 tons per 365 day period such that the requirements of 326 IAC 2-7 (Part 70 Operating Permit) shall not apply.

D.1.2 Hazardous Air Pollutant Emissions [326 IAC 2-8-4(1)]

- (a) Pursuant to 326 IAC 2-8-4(1), the emissions of a single hazardous air pollutant (HAP) from the model M-9 Heidelberg Press (emission unit #1), model M-600 Heidelberg-Harris Press (emission unit #2) and Videojet Printer inkjet printer (emission unit #3) shall not exceed 0.73 tons per month. This emissions limitation is equivalent to 8.76 tons of any individual HAP per 365 day period such that the requirements of the Part 70 Operating Permit program shall not apply.
- (b) Pursuant to 326 IAC 2-8-4(1), the emissions of any combination of hazardous air pollutants (HAPs) from the model M-9 Heidelberg Press (emission unit #1), model M-600 Heidelberg-Harris Press (emission unit #2) and Videojet Printer inkjet printer(emission unit #3) shall not exceed 1.96 tons per month. This emissions limitation is equivalent to 23.52 tons of any combination of HAPs per 365 day period such that the requirements of the Part 70 Operating Permit program shall not apply.

All the other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment to the front of the original permit.

This decision is subject to Indiana Administrative Order and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ms. Monica Dick, by phone at 317-327-2512 or by Fax at 317-327-2274 or by mail at the Environmental Resources Management Divisions, Air Quality Management Section, 2700 South Belmont Avenue, Indianapolis Indiana 46221.

Sincerely,

Mona A. Salem, Chief Operating Officer Department of Public Works City of Indianapolis

Attachments M.D.

cc: U.S. EPA, Region V

Mindy Hahn, IDEM OAM

Mark Caraher

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) ENHANCED NEW SOURCE REVIEW

OFFICE OF AIR MANAGEMENT and INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION AIR QUALITY MANAGEMENT SECTION

GAC Indianapolis, Web Division 5455 West 84th Street Indianapolis, Indiana 46268

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).	
Operation Permit No.: F097-5516-00145	
Issued by: Dr. Robert Holm, Administrator ERMD	Issuance Date: December 12, 1996
First Minor Permit Modification: MMF097-8797	Pages Affected: 1 through 33
Issued by: Dr. Robert Holm, Administrator ERMD	Issuance Date: January 9, 1998
First Administrative Permit Amendment: AAF097-10224-00145	Pages Affected: 1, 4, 26, 29, 30, 31, 32, 33
Issued by: Dr. Robert Holm, Administrator ERMD	Issuance Date: November 9, 1998
Second Minor Permit Revision	Pages Affected: 1, 4, 26, 27, 28
MMF 097-12262-00145	rages Allecteu. 1, 4, 20, 27, 20
Issued by: Mona A. Salem Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date: May 24, 2000
Second Administrative Permit Amendment: AAF097-12371-00145	Pages Affected: 1, 4, 26
Issued by: Mona A. Salem Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date: June 23, 2000

Second Administrative Permit Amendment AA 097-12371-00145 GAC Indianapolis, Web Division Page 4 of 33 FESOP No. F097-5516-00145 Indianapolis, Indiana June 9, 2000

Permit Reviewer: Monica Dick

SOURCE SUMMARY SECTION A

General Information [326 IAC 2-8-3 (b)] A.1

The Permittee owns and operates a Lithographic Printing Operation.

Responsible Official: Mr. Timothy Browning

5455 West 84th Street, Indianapolis Indiana 46268 Source Address:

Mailing Address: P.O. Box 68110, Indianapolis Indiana

SIC Code: 2752 and 2732

County Location: Marion

County Status: Attainment for all criteria pollutants

Source Status: Minor Source, PSD Rules;

Synthetic Minor Source, Part 70 Permit Program

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following emission units and pollution control devices:

- 1) Emitting units number one (1) is a Heidelberg Lithographic Heatset Offset Web Press model number M-9 equipped with a 0.75 MMBTU/hour natural gas fired dryer. The Heidelberg Press has a maximum operating capacity of 25.58 million square inches per hour. VOC and HAP emissions are controlled by a 3.36 MMBTU/hour Thermal Incinerator exhausting out one (1) stack identified as S₂.
- 2) Emitting units number two (2) is a Heidelberg -Harris Lithographic Heatset Offset Web Press model number M-600 equipped with a 0.75 MMBTU/hour natural gas fired dryer. The Heidelberg Press has a maximum operating capacity of 26.92 million square inches per hour. VOC and HAP emissions are controlled by a 3.36 MMBTU/hour Thermal Incinerator exhausting out one (1) stack identified as S₂.
- 3) Emissions Unit number three (3) inkjet printer. The inkjet printer has a maximum ink usage of equal to or less than 0.5527 pounds per hour and a maximum usage of makeup solvent of equal to or less than 0.8357 pounds per hour. Emissions from this unit are vented into the building. This unit was installed after June 9, 2000.

A.3 Insignificant Activities [326 IAC 2-7-1(20)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- Natural gas-fired combustion sources with heat input equal to or less than ten million (1) (10,000,000) Btu per hour.
- (2) Trimmers that do not produce fugitive emissions and that are equipped with a dust collector or trim material recovery device such as a bag filter or cyclone.
- Prepress Area is classified as an insignificant emitting activity based on the following (3) information. The Potential emissions for this area was based on extrapolation of actual usage data to reflect continuous hours of operation. The potential emissions for this area was established at 0.40 tons per year for all HAPs combined and 0.67 tons of VOC per year. The highest potential emissions of an individual HAP was established at 0.23 tons of Hexane.

SECTION D.1 FACILITY OPERATION CONDITIONS

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Emissions Limitations [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound Emissions:[326 IAC 8-1-6][326 IAC 2-8-4(1)]

- (a) Pursuant to 326 IAC 8-1-6 (General VOC Reduction Requirements for New Facilities), the VOC emissions from the M-9 and M-600 presses (emissions units #1 and #2) shall be controlled using Best Available Control Technology (BACT). BACT shall be:
 - 1) use of a thermal incinerator to control VOC emissions at all times the presses are in operation,
 - 2) a capture efficiency of 100% for VOCs from Inks and 70% for VOCs from fountain solutions, and
 - 3) a destruction efficiency of 96% in the Thermal Oxidizer for all VOCs collected.
- (b) Pursuant to 326 IAC 2-8-4(1), the total VOC emissions from the model M-9 Heidelberg Press (emission unit #1), model M-600 Heidelberg-Harris Press (emission unit #2) and inkjet printer (emission unit #3) shall not exceed 7.72 tons per month. This emissions limitation is equivalent to 98.28 tons per 365 day period such that the requirements of 326 IAC 2-7 (Part 70 Operating Permit) shall not apply.

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- (b) Pursuant to 326 IAC 2-8-4(1), the emissions of any combination of hazardous air pollutants (HAPs) from the model M-9 Heidelberg Press (emission unit #1), model M-600 Heidelberg-Harris Press (emission unit #2) and inkjet printer (emission unit #3) shall not exceed 1.96 tons per month. This emissions limitation is equivalent to 23.52 tons of any combination of HAPs per 365 day period such that the requirements of the Part 70 Operating Permit program shall not apply.